

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION
vs.	:	
	:	
KENT M. OZMAN a/k/a KENT OZMAN,	:	
	:	
Defendant	:	No. 17-3710
	:	

**INITIAL DISCLOSURES PURSUANT TO RULE 26(A)
OF THE FEDERAL RULES OF CIVIL PROCEDURE
OF THE DEFENDANT, KENT M. OZMAN**

Pursuant to Federal Rule of Civil Procedure 26 (a), the Defendant, Kent M. Ozman, hereby makes his initial disclosures:

A. The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Kent M. Ozman's initial disclosure is made without the benefit of any discovery. The Defendant, Kent M. Ozman, reserves the right to amend his disclosures to add additional witnesses. Kent M. Ozman, at this time, believes the following witnesses may have discoverable information relating to the material facts supporting his allegations, or otherwise are likely to have knowledge of issues relevant to this case:

1. Kent Ozman, 3400 Sherwood Road, Easton, PA 18045
2. US Department of Education
3. Federal Family Education Loan Program
4. Texas Guaranteed Student Loan Corporation
5. United Student Aid Funds, Inc.
6. FLEET/BAC
7. EDUCAID (Austin, TX)
8. TEAM
9. Antoine (Houston, TX)

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. Loan documents; applications; advertising & promotional materials provided to students; agreements between the lenders and guarantors; assignments; records of payments; interest charges and fluctuations; notices; account histories; state consumer protection laws regarding schools that participated in a prohibited referral relationship with the original lenders of the loans; correspondence between any of the parties or the entities listed in section (A) above.
2. Documents related to the actions of set forth in the Plaintiffs' Complaint and the Defendants' Answers and Defenses, including, but not limited to, court pleadings and decisions.
3. Documents and attachments filed with the Court by any party in this case.
4. Testimony transcripts and documents used as exhibits in discovery by any party in this case, including exhibits to depositions taken in this case.
10. All of the aforesaid documents are located either in the Plaintiffs' possession, or in the possession of the US Department of Education, the Federal Family Education Loan Program's possession, the Texas Guaranteed Student Loan Corporation, the United Student Aid Funds, Inc., FLEET/BAC, EDUCAID (Austin, TX), TEAM and/or Antoine (Houston, TX).

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and/or as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosures, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable to the Defendant Ozman.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None for the Defendant, Kent Ozman.

Respectfully submitted,

Andrew J. Katsock, III /s/

ANDREW J. KATSOCK, III
Attorney for the Defendant, Kent M. Ozman
15 Sunrise Drive, Wilkes-Barre, PA 18705
(570) 829-5884

CERTIFICATE OF SERVICE

I, ANDREW J. KATSOCK, III, certify that I served true and correct copies of the within INITIAL DISCLOSURES PURSUANT TO RULE 26(A) OF THE FEDERAL RULES OF CIVIL PROCEDURE OF THE DEFENDANT, KENT M. OZMAN, on the following parties on November 15, 2017, by ECM-Electronic filing to:

Rebecca A. Solarz, Esquire
Attorney for Plaintiff
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

Andrew J. Katsock, III /s/

ANDREW J. KATSOCK, III, Esquire
Attorney for the Defendant, Kent M. Ozman
15 Sunrise Drive
Wilkes-Barre, PA 18705
(570) 829-5884
